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**VIA ECF**

June 21, 2024

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Hon. Louis L. Stanton  
 Daniel Patrick Moynihan  
 United States Courthouse  
 500 Pearl St.  
 New York, NY 10007-1312

Re: **XYZ Corp., v. Individuals, et. al.,** (Dkt # 1:24-cv-4428-LLS)  
 Motion to Adjourn the Preliminary Injunction Hearing and the Related Filing Deadlines

Dear Hon. Stanton:

This office represents Plaintiffs in the above referenced copyright infringement action against Defendants, who have infringed upon Plaintiff's rights by selling products through their e-commerce storefronts. On March June 12, 2024, the Court entered a Temporary Restraining Order (the "TRO") requiring Etsy, Inc., ("Etsy") and the Financial Institutions to restrain Defendants' online seller's accounts. Among other items, the Court set forth a preliminary injunction hearing for June 25, 2024. Etsy was served with, and received the TRO, on June 14, 2024. Although the TRO required Etsy to respond within five days of receipt of the TRO, Etsy sent a response was not received until mid-day June 20, 2024. Moreover, a very limited amount of contact information was not provided, requiring Plaintiff to confirm whether Etsy was in possession of the same.

As such, Plaintiffs have only now received Defendants' contact information. Additionally, Etsy has not yet provided all of the information that it was ordered to produce as part of the TRO, e.g., information relating to Defendants' connected accounts with financial institutions. Therefore, Plaintiffs have not had any opportunity to serve any financial institutions as Plaintiffs does not know which financial institution is connected to any Defendant. Additionally, no Defendant has been served with the TRO, thus implicating their opportunity to appear in this matter and/or oppose the issuance of a preliminary injunction.

For the aforementioned reasons, it is respectfully requested that the Court 1) adjourn the June 25, 2024, preliminary injunction hearing until July 9, 2024, 2) extend the terms of the TRO for an additional fourteen day period; 3) require any defendant that wishes to modify or dissolve the TRO to serve its notice on or by July 5, 2024, 4) extend the deadline for any opposing papers to filed on or before July 8, 2024. This is Plaintiffs' first request for an adjournment of this hearing. Plaintiffs respectfully submits that the aforementioned delays, and the need to serve the Defendants, satisfies the good cause standard under Fed. R. Civ. P 65(b).

Items 1), 3) and 4) (the second

Respectfully submitted,

three) are granted. Item 3), extension of the TRO, will be available only upon deposit of the bond.

/s/ Dmitry Lapin  
 Dmitry Lapin, Esq.

So Ordered. Louis L. Stanton

6/21/24

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